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October 10, 2022

*Via Email*

C. Anthony Shippam and Gregory S. Harrison  
Stewart Management Company  
Farmers Bank Building  
301 N. Market Street  
Wilmington, DE 19801

Re: Broadbridge LA LLC

Dear Mr. Shippam and Mr. Harrison:

My firm was previously engaged to commence Chapter 11 proceedings on behalf of Broadbridge LA LLC (the “Debtor”) in view of an imminent foreclosure of the Debtor sole asset at 801 S. Broadway, Los Angeles, California (the “Property”). The foreclosure sale was scheduled for August 9, 2022 at 11:00 a.m. (PDT) in California, requiring emergency action by the Debtor on the morning of August 9. The Chapter 11 petition was filed in the Eastern District of New York that day. Copies of the Chapter 11 petition and schedules are attached.

If the Property was foreclosed, the Debtor and its principals faced a loss of between than \$100 million and \$110 million in capital and loans. Obviously, the situation was dire, and an emergency meeting was held on August 8, 2022 among the members of Broadbridge LA Member LC, the parent company of the Debtor pursuant to notice dated August 5, 2022. Independent Managers of the managing entity received notice. We were not aware of your involvement with the Debtor at that time.

Since then, the Debtor’s lender, Museum Building Holdings LLC has moved to dismiss the Chapter 11 petition on various grounds, including that you did not attend the emergency meeting and have not consent to the bankruptcy filing. We have filed detailed opposition to this motion on behalf of the Debtor relating to the need for your consent. Copies of the dismissal motion and the opposition thereto are enclosed for your ready reference.

It is the Debtor's position that the requirement for your consent is not enforceable as a matter of public policy. Nevertheless, we are inquiring as to whether you have a position on the Chapter 11 filing. Please email me a good time to speak so we can discuss the matter further.

Very truly yours,

/s/ Kevin J. Nash, Esq.

Enclosures

cc: Lawrence Kotler, Esq.